

~~SUPPRESSED~~

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

APR 28 2021
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DAVID BARKLAGE,)
)
Defendant.)

4:21CR272 MTS/SRW

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

At all times relevant to the Indictment:

1. The defendant, **DAVID BARKLAGE** (hereinafter referred to as “**BARKLAGE**”), was a political campaign manager, consultant, and lobbyist who owned, operated, or was otherwise associated with Barklage and Knodell, a partnership owned 50% by **BARKLAGE**, and The Barklage Company, a corporation owned 100% by **BARKLAGE**.
2. During 2012-14, **BARKLAGE** had several sources of income, but he did not report a substantial portion of his income on his individual income tax returns. Specifically, **BARKLAGE** had three main sources of unreported income. First, **BARKLAGE** received \$111,500, \$64,464, and \$33,535 from a political campaign in the State of Missouri during the tax years 2012, 2013, and 2014, respectively. Second, **BARKLAGE** received \$30,000 in lobbying fees that he earned from a company during tax year 2013. Third, **BARKLAGE** earned \$122,580 from an independent media producer, during tax year 2012. **BARKLAGE** deposited all of these funds into his personal bank account, instead of his business bank accounts. **BARKLAGE** then

willfully failed to disclose these funds or turn over his personal bank account information and statements to his tax return preparer. Thus, these funds and earnings were not included on **BARKLAGE's** tax returns for the years 2012, 2013, and 2014. At the time, **BARKLAGE** knew that these funds were reportable income for tax purposes, knew that he should provide this earnings information to his tax preparer, and knew that his tax returns would, therefore, be false and would be transmitted to the Internal Revenue Service.

3. By failing to provide this earnings information to his tax preparer, **BARKLAGE** caused the creation, issuance, and filing of false personal form 1040 tax returns and a substantial under-reporting of his income on those personal 1040 tax returns. **BARKLAGE** failed to report a total of \$443,633.00 in income for the tax years 2012-14.

4. As a result of his under-reporting of his income, **BARKLAGE** owes \$151,843 for the 2012-14 tax years.

5. On or about April 15, 2015, in the Eastern District of Missouri,

DAVID BARKLAGE,

the defendant herein, did willfully make and subscribe his 2014 individual income tax return, which contained or was verified by a written declaration that it was made under the penalties of perjury, and which **DAVID BARKLAGE** did not believe to be true and correct as to every material matter.

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

HAL GOLDSMITH, #32984MO
Assistant United States Attorney